

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**AGERE SYSTEMS, INC., CYTEC
INDUSTRIES INC., FORD MOTOR
COMPANY, SPS TECHNOLOGIES, LLC
and TI GROUP AUTOMOTIVE
SYSTEMS, LLC**

Plaintiffs,

V.

**ADVANCED ENVIRONMENTAL
TECHNOLOGY CORPORATION, et al.,**

Defendants.

Civil Action No. 02-CV-3830 (LDD)

**PLAINTIFFS' RESPONSES TO JOINT
CONTENTION INTERROGATORIES OF
ADVANCED ENVIRONMENTAL
TECHNOLOGY CORPORATION,
ASHLAND, INC., CARPENTER
TECHNOLOGY CORPORATION, fcg,
inc., HANDY & HARMAN TUBE
COMPANY, INC. AND NRM
INVESTMENT COMPANY**

Plaintiffs Agere Systems, Inc., Cytec Industries Inc., Ford Motor Company, SPS Technologies, LLC and TI Group Automotive Systems, LLC ("Plaintiffs"), by their undersigned attorneys, object and respond to the joint contention interrogatories of Advanced Environmental Technology Corporation ("AETC"), Ashland, Inc., Carpenter Technology Corporation, fcg, inc., Handy & Harman Tube Company, Inc. and NRM Investment Company (collectively, "Defendants") as follows:

GENERAL STATEMENTS AND OBJECTIONS

1. Plaintiffs object to Defendants' Definitions, Instructions and Interrogatories to the extent that they are not "narrowly-tailored contention interrogatories" as permitted by Judge Davis' June 23, 2005 Order.

2. Plaintiffs object to Defendants' Definitions, Instructions and Interrogatories to the extent that they seek information outside the scope of the contentions that Plaintiffs will make as part of their prima facie case at trial. Plaintiffs specifically reserve the right to make any factual

and legal contentions, whether expressly set forth in their responses to these Interrogatories or not, in response to positions taken by Defendants at trial.

3. Plaintiffs object to Defendants' Definitions, Instructions and Interrogatories to the extent that they seek information and documents that are not relevant to the subject matter of this action or are not reasonably calculated to lead to the discovery of admissible evidence.

4. Plaintiffs object to Defendants' Definitions, Instructions and Interrogatories to the extent that they seek information not in Plaintiffs' possession, custody or control.

5. Plaintiffs object to Defendants' Definitions, Instructions and Interrogatories to the extent that they seek information already in the possession, custody or control of Defendants.

6. Plaintiffs object to Defendants' Definitions, Instructions and Interrogatories to the extent that they seek information which is publicly available or that is attainable by Defendants from a source other than Plaintiffs at no greater inconvenience, burden, or expense than Defendants seek to impose on Plaintiffs.

7. Plaintiffs object to Defendants' Definitions, Instructions and Interrogatories to the extent that they seek information protected by the attorney-client privilege or any other applicable privilege. Any inadvertent disclosure of privileged information shall not constitute a waiver of the attorney-client or any other applicable privilege.

8. Plaintiffs object to Defendants' Definitions, Instructions and Interrogatories to the extent that they seek the discovery of the mental impressions, conclusions, strategies, opinions, research or legal theories of their attorneys or other representatives. Any inadvertent disclosure of work product shall not constitute a waiver of any work product protection.

9. Plaintiffs object to Defendants' Definitions, Instructions and Interrogatories to the extent that they are not limited in time or scope.

10. Plaintiffs object to Defendants' Definitions, Instructions and Interrogatories to the extent that they are unduly burdensome, onerous, oppressive, or designed to be harassing or will cause unnecessary expense.

11. Plaintiffs object to Defendants' Definitions, Instructions and Interrogatories to the extent that they are overly broad, vague or ambiguous.

12. Plaintiffs object to Defendants' Definitions, Instructions and Interrogatories to the extent that they seek to alter or exceed the scope of the obligations placed on Plaintiffs by the Federal Rules of Civil Procedure or other applicable law, including, but not limited to, any obligations Plaintiffs may have to supplement or amend their answers.

13. Plaintiffs' responses to the Defendants' contention interrogatories shall serve to supplement their previous responses to Defendants' discovery requests.

14. A specific reference to a particular General Objection in the following responses is not intended to exclude the application of other General Objections to that response or of the General Objections to other responses. To the extent that Plaintiffs respond to Interrogatories to which it objects, such objections are not waived by the furnishing of information or providing of documents.

INTERROGATORIES AND RESPONSES

Subject to and without waiving the foregoing General Objections, Plaintiffs make the following responses to the joint contention interrogatories of Defendants:

1. Do plaintiffs contend that Agere Systems, Inc. ("Agere") arranged for the disposal of drummed waste at the Site?
 - A. If not, what is the factual and legal basis for your response.
 - B. If so, how many drums of waste do plaintiffs contend Agere arranged to be disposed of at the Site?
 - i. What is the factual basis for plaintiffs' contention as to the number of drums set forth in the answer to above?
 - C. If so, what do plaintiffs contend the drummed waste that Agere arranged to be disposed of at the Site consisted of?
 - i. What is the factual basis for plaintiffs' contention as to what the drummed waste consisted of, as set forth in the answer to above?
 - D. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: Plaintiffs object to this Interrogatory to the extent that it seeks information outside the scope of the contentions that Plaintiffs will make as part of their prima facie case at trial. Plaintiffs further object to the phrases "arranged for the disposal of drummed waste at the Site" and "arranged for bulk waste to be disposed of at the Site" because they are vague, confusing and ambiguous. Plaintiffs further object to this Interrogatory to the extent that it seeks the discovery of the mental impressions, conclusions, strategies, opinions, research or legal theories of its attorneys or other representatives or information protected by the attorney-client privilege or any other applicable privilege. By way of further objection, Defendants' definition of "factual basis" is overbroad and unduly burdensome.

Without waiving any such objections, Plaintiffs will not ask the Court at trial to make findings of fact or conclusions of law that Agere or any other entities arranged for waste to be disposed of specifically at the Site, except that Plaintiffs will ask the Court to conclude that

AETC knew that DCC was disposing of Ashland's waste at the Site and that Ashland knew that DCC intended to use the Site for disposal of Ashland waste. By way of further response, see Plaintiffs' response to Interrogatory No. 78.

2. Do plaintiffs contend that Agere arranged for bulk waste to be disposed of at the Site?

A. If not, what is the factual and legal basis for your response.

B. If so, what do plaintiffs contend is the total volume of bulk waste that Agere arranged to be disposed of at the Site?

i. What is the factual basis for plaintiffs' contention as to the total volume of bulk waste as set forth in the answer to above?

C. If so, what do plaintiffs contend the bulk waste that Agere arranged to be disposed of at the Site consisted of?

i. What is the factual basis for plaintiffs' contention as to what the bulk waste consisted of, as set forth in the answer to above?

D. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

3. Do plaintiffs contend that Cytec Industries Inc. ("Cytec") arranged for the disposal of drummed waste at the Site?

A. If not, what is the factual and legal basis for your response.

B. If so, how many drums of waste do plaintiffs contend Cytec arranged to be disposed of at the Site?

i. What is the factual basis for plaintiffs' contention as to the number of drums set forth in the answer to above?

C. If so, what do plaintiffs contend the drummed waste that Cytec arranged to be disposed of at the Site consisted of?

i. What is the factual basis for plaintiffs' contention as to what the drummed waste consisted of, as set forth in the answer to above?

D. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

4. Do plaintiffs contend that Cytec arranged for bulk waste to be disposed of at the Site?

- A. If not, what is the factual and legal basis for your response.
- B. If so, what do plaintiffs contend is the total volume of bulk waste that Cytec arranged to be disposed of at the Site?
 - i. What is the factual basis for plaintiffs' contention as to the total volume of bulk waste as set forth in the answer to above?
- C. If so, what do plaintiffs contend the bulk waste that Cytec arranged to be disposed of at the Site consisted of?
 - i. What is the factual basis for plaintiffs' contention as to what the bulk waste consisted of, as set forth in the answer to above?
- D. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

5. Do plaintiffs contend that Ford Motor Company ("Ford") arranged for the disposal of drummed waste at the Site?

- A. If not, what is the factual and legal basis for your response.
- B. If so, how many drums of waste do plaintiffs contend Ford arranged to be disposed of at the Site?
 - i. What is the factual basis for plaintiffs' contention as to the number of drums set forth in the answer to above?
- C. If so, what do plaintiffs contend the drummed waste that Ford arranged to be disposed of at the Site consisted of?
 - i. What is the factual basis for plaintiffs' contention as to what the drummed waste consisted of, as set forth in the answer to above?
- D. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

6. Do plaintiffs contend that Ford arranged for bulk waste to be disposed of at the Site?

- A. If not, what is the factual and legal basis for your response.
- B. If so, what do plaintiffs contend is the total volume of bulk waste that Ford arranged to be disposed of at the Site?
 - i. What is the factual basis for plaintiffs' contention as to the total volume of bulk waste as set forth in the answer to above?

C. If so, what do plaintiffs contend the bulk waste that Ford arranged to be disposed of at the Site consisted of?

i. What is the factual basis for plaintiffs' contention as to what the bulk waste consisted of, as set forth in the answer to above?

D. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

7. Do plaintiffs contend that SPS Technologies, LLC ("SPS") arranged for the disposal of drummed waste at the Site?

A. If not, what is the factual and legal basis for your response.

B. If so, how many drums of waste do plaintiffs contend SPS arranged to be disposed of at the Site?

i. What is the factual basis for plaintiffs' contention as to the number of drums set forth in the answer to above?

C. If so, what do plaintiffs contend the drummed waste that SPS arranged to be disposed of at the Site consisted of?

i. What is the factual basis for plaintiffs' contention as to what the drummed waste consisted of, as set forth in the answer to above?

D. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

8. Do plaintiffs contend that SPS arranged for bulk waste to be disposed of at the Site?

A. If not, what is the factual and legal basis for your response.

B. If so, what do plaintiffs contend is the total volume of bulk waste that SPS arranged to be disposed of at the Site?

i. What is the factual basis for plaintiffs' contention as to the total volume of bulk waste as set forth in the answer to above?

C. If so, what do plaintiffs contend the bulk waste that SPS arranged to be disposed of at the Site consisted of?

i. What is the factual basis for plaintiffs' contention as to what the bulk waste consisted of, as set forth in the answer to above?

D. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

9. Do plaintiffs contend that TI Group Automotive Systems LLC ("TI") arranged for the disposal of drummed waste at the Site?
- A. If not, what is the factual and legal basis for your response.
- B. If so, how many drums of waste do plaintiffs contend TI arranged to be disposed of at the Site?
- i. What is the factual basis for plaintiffs' contention as to the number of drums set forth in the answer to above?
- C. If so, what do plaintiffs contend the drummed waste that TI arranged to be disposed of at the Site consisted of?
- i. What is the factual basis for plaintiffs' contention as to what the drummed waste consisted of, as set forth in the answer to above?
- D. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

10. Do plaintiffs contend that TI arranged for bulk waste to be disposed of at the Site?
- A. If not, what is the factual and legal basis for your response.
- B. If so, what do plaintiffs contend is the total volume of bulk waste that TI arranged to be disposed of at the Site?
- i. What is the factual basis for plaintiffs' contention as to the total volume of bulk waste as set forth in the answer to above?
- C. If so, what do plaintiffs contend the bulk waste that TI arranged to be disposed of at the Site consisted of?
- i. What is the factual basis for plaintiffs' contention as to what the bulk waste consisted of, as set forth in the answer to above?
- D. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

11. Do plaintiffs contend that Advanced Environmental Technology Corp. ("AETC") arranged for the disposal of drummed waste at the Site?
- A. If not, what is the factual and legal basis for your response.

- B. If so, what is the factual and legal basis for plaintiffs' contention that AETC arranged for drummed waste to be disposed of at the Site?
- C. If so, how many drums of waste do plaintiffs contend AETC arranged to be disposed of at the Site?
 - i. What is the factual basis for plaintiffs' contention as to the number of drums set forth in the answer to above?
- D. If so, what do plaintiffs contend the drummed waste that AETC arranged to be disposed of at the Site consisted of?
 - i. What is the factual basis for plaintiffs' contention as to what the drummed waste consisted of, as set forth in the answer to above?
- E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

12. Do plaintiffs contend that AETC arranged for bulk waste to be disposed of at the Site?

- A. If not, what is the factual and legal basis for your response.
- B. If so, what is the factual and legal basis for plaintiffs' contention that AETC arranged for bulk waste to be disposed of at the Site?
- C. If so, what do plaintiffs contend is the total volume of bulk waste that AETC arranged to be disposed of at the Site?
 - i. What is the factual basis for plaintiffs' contention as to the total volume of bulk waste as set forth in the answer to above?
- D. If so, what do plaintiffs contend the bulk waste that AETC arranged to be disposed of at the Site consisted of?
 - i. What is the factual basis for plaintiffs' contention as to what the bulk waste consisted of, as set forth in the answer to above?
- E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

13. Do plaintiffs contend that Ashland Inc. ("Ashland") arranged for the disposal of drummed waste at the Site?

- A. If not, what is the factual and legal basis for your response.
- B. If so, what is the factual and legal basis for plaintiffs' contention that Ashland arranged for drummed waste to be disposed of at the Site?

- C. If so, how many drums of waste do plaintiffs contend Ashland arranged to be disposed of at the Site?
 - i. What is the factual basis for plaintiffs' contention as to the number of drums set forth in the answer to above?
- D. If so, what do plaintiffs contend the drummed waste that Ashland arranged to be disposed of at the Site consisted of?
 - i. What is the factual basis for plaintiffs' contention as to what the drummed waste consisted of, as set forth in the answer to above?
- E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

- 14. Do plaintiffs contend that Ashland arranged for bulk waste to be disposed of at the Site?
 - A. If not, what is the factual and legal basis for your response.
 - B. If so, what is the factual and legal basis for plaintiffs' contention that Ashland arranged for bulk waste to be disposed of at the Site?
 - C. If so, what do plaintiffs contend is the total volume of bulk waste that Ashland arranged to be disposed of at the Site?
 - i. What is the factual basis for plaintiffs' contention as to the total volume of bulk waste as set forth in the answer to above?
 - D. If so, what do plaintiffs contend the bulk waste that Ashland arranged to be disposed of at the Site consisted of?
 - i. What is the factual basis for plaintiffs' contention as to what the bulk waste consisted of, as set forth in the answer to above?
 - E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

- 15. Do plaintiffs contend that Boarhead Corporation ("Boarhead") arranged for the disposal of drummed waste at the Site?
 - A. If not, what is the factual and legal basis for your response.
 - B. If so, what is the factual and legal basis for plaintiffs' contention that Boarhead arranged for drummed waste to be disposed of at the Site?
 - C. If so, how many drums of waste do plaintiffs contend Boarhead arranged to be disposed of at the Site?

- i. What is the factual basis for plaintiffs' contention as to the number of drums set forth in the answer to above?
- D. If so, what do plaintiffs contend the drummed waste that Boarhead arranged to be disposed of at the Site consisted of?
 - i. What is the factual basis for plaintiffs' contention as to what the drummed waste consisted of, as set forth in the answer to above?
- E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

16. Do plaintiffs contend that Boarhead arranged for bulk waste to be disposed of at the Site?
- A. If not, what is the factual and legal basis for your response.
 - B. If so, what is the factual and legal basis for plaintiffs' contention that Boarhead arranged for bulk waste to be disposed of at the Site?
 - C. If so, what do plaintiffs contend is the total volume of bulk waste that Boarhead arranged to be disposed of at the Site?
 - i. What is the factual basis for plaintiffs' contention as to the total volume of bulk waste as set forth in the answer to above?
 - D. If so, what do plaintiffs contend the bulk waste that Boarhead arranged to be disposed of at the Site consisted of?
 - i. What is the factual basis for plaintiffs' contention as to what the bulk waste consisted of, as set forth in the answer to above?
 - E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

17. Do plaintiffs contend that Carpenter Technology Corporation ("Carpenter") arranged for the disposal of drummed waste at the Site?
- A. If not, what is the factual and legal basis for your response.
 - B. If so, what is the factual and legal basis for plaintiffs' contention that Carpenter arranged for drummed waste to be disposed of at the Site?
 - C. If so, how many drums of waste do plaintiffs contend Carpenter arranged to be disposed of at the Site?
 - i. What is the factual basis for plaintiffs' contention as to the number of drums set forth in the answer to above?

- D. If so, what do plaintiffs contend the drummed waste that Carpenter arranged to be disposed of at the Site consisted of?
 - i. What is the factual basis for plaintiffs' contention as to what the drummed waste consisted of, as set forth in the answer to above?
- E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

18. Do plaintiffs contend that Carpenter arranged for bulk waste to be disposed of at the Site?

- A. If not, what is the factual and legal basis for your response.
- B. If so, what is the factual and legal basis for plaintiffs' contention that Carpenter arranged for bulk waste to be disposed of at the Site?
- C. If so, what do plaintiffs contend is the total volume of bulk waste that Carpenter arranged to be disposed of at the Site?
 - i. What is the factual basis for plaintiffs' contention as to the total volume of bulk waste as set forth in the answer to above?
- D. If so, what do plaintiffs contend the bulk waste that Carpenter arranged to be disposed of at the Site consisted of?
 - i. What is the factual basis for plaintiffs' contention as to what the bulk waste consisted of, as set forth in the answer to above?
- E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

19. Do plaintiffs contend that Crown Metro, Inc./Emhart Industries, Inc. ("Crown") arranged for the disposal of drummed waste at the Site?

- A. If not, what is the factual and legal basis for your response.
- B. If so, what is the factual and legal basis for plaintiffs' contention that Crown arranged for drummed waste to be disposed of at the Site?
- C. If so, how many drums of waste do plaintiffs contend Crown arranged to be disposed of at the Site?
 - i. What is the factual basis for plaintiffs' contention as to the number of drums set forth in the answer to above?
- D. If so, what do plaintiffs contend the drummed waste that Crown arranged to be disposed of at the Site consisted of?

i. What is the factual basis for plaintiffs' contention as to what the drummed waste consisted of, as set forth in the answer to above?

E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

20. Do plaintiffs contend that Crown arranged for bulk waste to be disposed of at the Site?

A. If not, what is the factual and legal basis for your response.

B. If so, what is the factual and legal basis for plaintiffs' contention that Crown arranged for bulk waste to be disposed of at the Site?

C. If so, what do plaintiffs contend is the total volume of bulk waste that Crown arranged to be disposed of at the Site?

i. What is the factual basis for plaintiffs' contention as to the total volume of bulk waste as set forth in the answer to above?

D. If so, what do plaintiffs contend the bulk waste that Crown arranged to be disposed of at the Site consisted of?

i. What is the factual basis for plaintiffs' contention as to what the bulk waste consisted of, as set forth in the answer to above?

E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

21. Do plaintiffs contend that Diaz Chemical Corporation ("Diaz") arranged for the disposal of drummed waste at the Site?

A. If not, what is the factual and legal basis for your response.

B. If so, what is the factual and legal basis for plaintiffs' contention that Diaz arranged for drummed waste to be disposed of at the Site?

C. If so, how many drums of waste do plaintiffs contend Diaz arranged to be disposed of at the Site?

i. What is the factual basis for plaintiffs' contention as to the number of drums set forth in the answer to above?

D. If so, what do plaintiffs contend the drummed waste that Diaz arranged to be disposed of at the Site consisted of?

i. What is the factual basis for plaintiffs' contention as to what the drummed waste consisted of, as set forth in the answer to above?

E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

22. Do plaintiffs contend that Diaz arranged for bulk waste to be disposed of at the Site?

A. If not, what is the factual and legal basis for your response.

B. If so, what is the factual and legal basis for plaintiffs' contention that Diaz arranged for bulk waste to be disposed of at the Site?

C. If so, what do plaintiffs contend is the total volume of bulk waste that Diaz arranged to be disposed of at the Site?

i. What is the factual basis for plaintiffs' contention as to the total volume of bulk waste as set forth in the answer to above?

D. If so, what do plaintiffs contend the bulk waste that Diaz arranged to be disposed of at the Site consisted of?

i. What is the factual basis for plaintiffs' contention as to what the bulk waste consisted of, as set forth in the answer to above?

E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

23. Do plaintiffs contend that Etched Circuits, Inc. ("Etched") arranged for the disposal of drummed waste at the Site?

A. If not, what is the factual and legal basis for your response.

B. If so, what is the factual and legal basis for plaintiffs' contention that Etched arranged for drummed waste to be disposed of at the Site?

C. If so, how many drums of waste do plaintiffs contend Etched arranged to be disposed of at the Site?

i. What is the factual basis for plaintiffs' contention as to the number of drums set forth in the answer to above?

D. If so, what do plaintiffs contend the drummed waste that Etched arranged to be disposed of at the Site consisted of?

i. What is the factual basis for plaintiffs' contention as to what the drummed waste consisted of, as set forth in the answer to above?

E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

24. Do plaintiffs contend that Etched arranged for bulk waste to be disposed of at the Site?
- A. If not, what is the factual and legal basis for your response.
 - B. If so, what is the factual and legal basis for plaintiffs' contention that Etched arranged for bulk waste to be disposed of at the Site?
 - C. If so, what do plaintiffs contend is the total volume of bulk waste that Etched arranged to be disposed of at the Site?
 - i. What is the factual basis for plaintiffs' contention as to the total volume of bulk waste as set forth in the answer to above?
 - D. If so, what do plaintiffs contend the bulk waste that Etched arranged to be disposed of at the Site consisted of?
 - i. What is the factual basis for plaintiffs' contention as to what the bulk waste consisted of, as set forth in the answer to above?
 - E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

25. Do plaintiffs contend that fcg, Inc. ("fcg") arranged for the disposal of drummed waste at the Site?
- A. If not, what is the factual and legal basis for your response.
 - B. If so, what is the factual and legal basis for plaintiffs' contention that fcg arranged for drummed waste to be disposed of at the Site?
 - C. If so, how many drums of waste do plaintiffs contend fcg arranged to be disposed of at the Site?
 - i. What is the factual basis for plaintiffs' contention as to the number of drums set forth in the answer to above?
 - D. If so, what do plaintiffs contend the drummed waste that fcg arranged to be disposed of at the Site consisted of?
 - i. What is the factual basis for plaintiffs' contention as to what the drummed waste consisted of, as set forth in the answer to above?
 - E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

26. Do plaintiffs contend that fcg arranged for bulk waste to be disposed of at the Site?
- A. If not, what is the factual and legal basis for your response.
 - B. If so, what is the factual and legal basis for plaintiffs' contention that fcg arranged for bulk waste to be disposed of at the Site?
 - C. If so, what do plaintiffs contend is the total volume of bulk waste that fcg arranged to be disposed of at the Site?
 - i. What is the factual basis for plaintiffs' contention as to the total volume of bulk waste as set forth in the answer to above?
 - D. If so, what do plaintiffs contend the bulk waste that fcg arranged to be disposed of at the Site consisted of?
 - i. What is the factual basis for plaintiffs' contention as to what the bulk waste consisted of, as set forth in the answer to above?
 - E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

27. Do plaintiffs contend that Handy & Harman Tube Company ("H&H") arranged for the disposal of drummed waste at the Site?
- A. If not, what is the factual and legal basis for your response.
 - B. If so, what is the factual and legal basis for plaintiffs' contention that H&H arranged for drummed waste to be disposed of at the Site?
 - C. If so, how many drums of waste do plaintiffs contend H&H arranged to be disposed of at the Site?
 - i. What is the factual basis for plaintiffs' contention as to the number of drums set forth in the answer to above?
 - D. If so, what do plaintiffs contend the drummed waste that H&H arranged to be disposed of at the Site consisted of?
 - i. What is the factual basis for plaintiffs' contention as to what the drummed waste consisted of, as set forth in the answer to above?
 - E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

28. Do plaintiffs contend that H&H arranged for bulk waste to be disposed of at the Site?

- A. If not, what is the factual and legal basis for your response.
- B. If so, what is the factual and legal basis for plaintiffs' contention that H&H arranged for bulk waste to be disposed of at the Site?
- C. If so, what do plaintiffs contend is the total volume of bulk waste that H&H arranged to be disposed of at the Site?
 - i. What is the factual basis for plaintiffs' contention as to the total volume of bulk waste as set forth in the answer to above?
- D. If so, what do plaintiffs contend the bulk waste that H&H arranged to be disposed of at the Site consisted of?
 - i. What is the factual basis for plaintiffs' contention as to what the bulk waste consisted of, as set forth in the answer to above?
- E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

29. Do plaintiffs contend that Knoll Inc./Knoll International, Inc. ("Knoll") arranged for the disposal of drummed waste at the Site?

- A. If not, what is the factual and legal basis for your response.
- B. If so, what is the factual and legal basis for plaintiffs' contention that Knoll arranged for drummed waste to be disposed of at the Site?
- C. If so, how many drums of waste do plaintiffs contend Knoll arranged to be disposed of at the Site?
 - i. What is the factual basis for plaintiffs' contention as to the number of drums set forth in the answer to above?
- D. If so, what do plaintiffs contend the drummed waste that Knoll arranged to be disposed of at the Site consisted of?
 - i. What is the factual basis for plaintiffs' contention as to what the drummed waste consisted of, as set forth in the answer to above?
- E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

30. Do plaintiffs contend that Knoll arranged for bulk waste to be disposed of at the Site?

- A. If not, what is the factual and legal basis for your response.

- B. If so, what is the factual and legal basis for plaintiffs' contention that Knoll arranged for bulk waste to be disposed of at the Site?
- C. If so, what do plaintiffs contend is the total volume of bulk waste that Knoll arranged to be disposed of at the Site?
 - i. What is the factual basis for plaintiffs' contention as to the total volume of bulk waste as set forth in the answer to above?
- D. If so, what do plaintiffs contend the bulk waste that Knoll arranged to be disposed of at the Site consisted of?
 - i. What is the factual basis for plaintiffs' contention as to what the bulk waste consisted of, as set forth in the answer to above?
- E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

31. Do plaintiffs contend that Merit Metals Products Corp. ("Merit Metals") arranged for the disposal of drummed waste at the Site?
- A. If not, what is the factual and legal basis for your response.
 - B. If so, what is the factual and legal basis for plaintiffs' contention that Merit Metals arranged for drummed waste to be disposed of at the Site?
 - C. If so, how many drums of waste do plaintiffs contend Merit Metals arranged to be disposed of at the Site?
 - i. What is the factual basis for plaintiffs' contention as to the number of drums set forth in the answer to above?
 - D. If so, what do plaintiffs contend the drummed waste that Merit Metals arranged to be disposed of at the Site consisted of?
 - i. What is the factual basis for plaintiffs' contention as to what the drummed waste consisted of, as set forth in the answer to above?
 - E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

32. Do plaintiffs contend that Merit Metals arranged for bulk waste to be disposed of at the Site?
- A. If not, what is the factual and legal basis for your response.

- B. If so, what is the factual and legal basis for plaintiffs' contention that Merit Metals arranged for bulk waste to be disposed of at the Site?
- C. If so, what do plaintiffs contend is the total volume of bulk waste that Merit Metals arranged to be disposed of at the Site?
 - i. What is the factual basis for plaintiffs' contention as to the total volume of bulk waste as set forth in the answer to above?
- D. If so, what do plaintiffs contend the bulk waste that Merit Metals arranged to be disposed of at the Site consisted of?
 - i. What is the factual basis for plaintiffs' contention as to what the bulk waste consisted of, as set forth in the answer to above?
- E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

33. Do plaintiffs contend that Novartis Corporation ("Novartis") arranged for the disposal of drummed waste at the Site?
- A. If not, what is the factual and legal basis for your response.
 - B. If so, what is the factual and legal basis for plaintiffs' contention that Novartis arranged for drummed waste to be disposed of at the Site?
 - C. If so, how many drums of waste do plaintiffs contend Novartis arranged to be disposed of at the Site?
 - i. What is the factual basis for plaintiffs' contention as to the number of drums set forth in the answer to above?
 - D. If so, what do plaintiffs contend the drummed waste that Novartis arranged to be disposed of at the Site consisted of?
 - i. What is the factual basis for plaintiffs' contention as to what the drummed waste consisted of, as set forth in the answer to above?
 - E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

34. Do plaintiffs contend that Novartis arranged for bulk waste to be disposed of at the Site?
- A. If not, what is the factual and legal basis for your response.
 - B. If so, what is the factual and legal basis for plaintiffs' contention that Novartis arranged for bulk waste to be disposed of at the Site?

- C. If so, what do plaintiffs contend is the total volume of bulk waste that Novartis arranged to be disposed of at the Site?
 - i. What is the factual basis for plaintiffs' contention as to the total volume of bulk waste as set forth in the answer to above?
- D. If so, what do plaintiffs contend the bulk waste that Novartis arranged to be disposed of at the Site consisted of?
 - i. What is the factual basis for plaintiffs' contention as to what the bulk waste consisted of, as set forth in the answer to above?
- E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

35. Do plaintiffs contend that NRM Investment Company ("NRM") arranged for the disposal of drummed waste at the Site?
- A. If not, what is the factual and legal basis for your response.
 - B. If so, what is the factual and legal basis for plaintiffs' contention that NRM arranged for drummed waste to be disposed of at the Site?
 - C. If so, how many drums of waste do plaintiffs contend NRM arranged to be disposed of at the Site?
 - i. What is the factual basis for plaintiffs' contention as to the number of drums set forth in the answer to above?
 - D. If so, what do plaintiffs contend the drummed waste that NRM arranged to be disposed of at the Site consisted of?
 - i. What is the factual basis for plaintiffs' contention as to what the drummed waste consisted of, as set forth in the answer to above?
 - E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

36. Do plaintiffs contend that NRM arranged for bulk waste to be disposed of at the Site?
- A. If not, what is the factual and legal basis for your response.
 - B. If so, what is the factual and legal basis for plaintiffs' contention that NRM arranged for bulk waste to be disposed of at the Site?
 - C. If so, what do plaintiffs contend is the total volume of bulk waste that NRM arranged to be disposed of at the Site?

- i. What is the factual basis for plaintiffs' contention as to the total volume of bulk waste as set forth in the answer to above?
- D. If so, what do plaintiffs contend the bulk waste that NRM arranged to be disposed of at the Site consisted of?
 - i. What is the factual basis for plaintiffs' contention as to what the bulk waste consisted of, as set forth in the answer to above?
- E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

37. Do plaintiffs contend that Plymouth Tube Company ("Plymouth") arranged for the disposal of drummed waste at the Site?
- A. If not, what is the factual and legal basis for your response.
 - B. If so, what is the factual and legal basis for plaintiffs' contention that Plymouth arranged for drummed waste to be disposed of at the Site?
 - C. If so, how many drums of waste do plaintiffs contend Plymouth arranged to be disposed of at the Site?
 - i. What is the factual basis for plaintiffs' contention as to the number of drums set forth in the answer to above?
 - D. If so, what do plaintiffs contend the drummed waste that Plymouth arranged to be disposed of at the Site consisted of?
 - i. What is the factual basis for plaintiffs' contention as to what the drummed waste consisted of, as set forth in the answer to above?
 - E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

38. Do plaintiffs contend that Plymouth arranged for bulk waste to be disposed of at the Site?
- A. If not, what is the factual and legal basis for your response.
 - B. If so, what is the factual and legal basis for plaintiffs' contention that Plymouth arranged for bulk waste to be disposed of at the Site?
 - C. If so, what do plaintiffs contend is the total volume of bulk waste that Plymouth arranged to be disposed of at the Site?
 - i. What is the factual basis for plaintiffs' contention as to the total volume of bulk waste as set forth in the answer to above?

- D. If so, what do plaintiffs contend the bulk waste that Plymouth arranged to be disposed of at the Site consisted of?
 - i. What is the factual basis for plaintiffs' contention as to what the bulk waste consisted of, as set forth in the answer to above?
- E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

39. Do plaintiffs contend that Quickline Design and Manufacturing Co. ("Quickline") arranged for the disposal of drummed waste at the Site?

- A. If not, what is the factual and legal basis for your response.
- B. If so, what is the factual and legal basis for plaintiffs' contention that Quickline arranged for drummed waste to be disposed of at the Site?
- C. If so, how many drums of waste do plaintiffs contend Quickline arranged to be disposed of at the Site?
 - i. What is the factual basis for plaintiffs' contention as to the number of drums set forth in the answer to above?
- D. If so, what do plaintiffs contend the drummed waste that Quickline arranged to be disposed of at the Site consisted of?
 - i. What is the factual basis for plaintiffs' contention as to what the drummed waste consisted of, as set forth in the answer to above?
- E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

40. Do plaintiffs contend that Quickline arranged for bulk waste to be disposed of at the Site?

- A. If not, what is the factual and legal basis for your response.
- B. If so, what is the factual and legal basis for plaintiffs' contention that Quickline arranged for bulk waste to be disposed of at the Site?
- C. If so, what do plaintiffs contend is the total volume of bulk waste that Quickline arranged to be disposed of at the Site?
 - i. What is the factual basis for plaintiffs' contention as to the total volume of bulk waste as set forth in the answer to above?
- D. If so, what do plaintiffs contend the bulk waste that Quickline arranged to be disposed of at the Site consisted of?

i. What is the factual basis for plaintiffs' contention as to what the bulk waste consisted of, as set forth in the answer to above?

E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

41. Do plaintiffs contend that Rahns Specialty Metals, Inc./Techalloy Company Inc. ("RSM") arranged for the disposal of drummed waste at the Site?

A. If not, what is the factual and legal basis for your response.

B. If so, what is the factual and legal basis for plaintiffs' contention that RSM arranged for drummed waste to be disposed of at the Site?

C. If so, how many drums of waste do plaintiffs contend RSM arranged to be disposed of at the Site?

i. What is the factual basis for plaintiffs' contention as to the number of drums set forth in the answer to above?

D. If so, what do plaintiffs contend the drummed waste that RSM arranged to be disposed of at the Site consisted of?

i. What is the factual basis for plaintiffs' contention as to what the drummed waste consisted of, as set forth in the answer to above?

E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

42. Do plaintiffs contend that RSM arranged for bulk waste to be disposed of at the Site?

A. If not, what is the factual and legal basis for your response.

B. If so, what is the factual and legal basis for plaintiffs' contention that RSM arranged for bulk waste to be disposed of at the Site?

C. If so, what do plaintiffs contend is the total volume of bulk waste that RSM arranged to be disposed of at the Site?

i. What is the factual basis for plaintiffs' contention as to the total volume of bulk waste as set forth in the answer to above?

D. If so, what do plaintiffs contend the bulk waste that RSM arranged to be disposed of at the Site consisted of?

i. What is the factual basis for plaintiffs' contention as to what the bulk waste consisted of, as set forth in the answer to above?

E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

43. Do plaintiffs contend that Rohm and Haas Company ("R&H") arranged for the disposal of drummed waste at the Site?

A. If not, what is the factual and legal basis for your response.

B. If so, what is the factual and legal basis for plaintiffs' contention that R&H arranged for drummed waste to be disposed of at the Site?

C. If so, how many drums of waste do plaintiffs contend R&H arranged to be disposed of at the Site?

i. What is the factual basis for plaintiffs' contention as to the number of drums set forth in the answer to above?

D. If so, what do plaintiffs contend the drummed waste that R&H arranged to be disposed of at the Site consisted of?

i. What is the factual basis for plaintiffs' contention as to what the drummed waste consisted of, as set forth in the answer to above?

E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

44. Do plaintiffs contend that R&H arranged for bulk waste to be disposed of at the Site?

A. If not, what is the factual and legal basis for your response.

B. If so, what is the factual and legal basis for plaintiffs' contention that R&H arranged for bulk waste to be disposed of at the Site?

C. If so, what do plaintiffs contend is the total volume of bulk waste that R&H arranged to be disposed of at the Site?

i. What is the factual basis for plaintiffs' contention as to the total volume of bulk waste as set forth in the answer to above?

D. If so, what do plaintiffs contend the bulk waste that R&H arranged to be disposed of at the Site consisted of?

i. What is the factual basis for plaintiffs' contention as to what the bulk waste consisted of, as set forth in the answer to above?

E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

45. Do plaintiffs contend that Simon Wrecking Co. ("Simon") arranged for the disposal of drummed waste at the Site?
- A. If not, what is the factual and legal basis for your response.
 - B. If so, what is the factual and legal basis for plaintiffs' contention that Simon arranged for drummed waste to be disposed of at the Site?
 - C. If so, how many drums of waste do plaintiffs contend Simon arranged to be disposed of at the Site?
 - i. What is the factual basis for plaintiffs' contention as to the number of drums set forth in the answer to above?
 - D. If so, what do plaintiffs contend the drummed waste that Simon arranged to be disposed of at the Site consisted of?
 - i. What is the factual basis for plaintiffs' contention as to what the drummed waste consisted of, as set forth in the answer to above?
 - E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

46. Do plaintiffs contend that Simon arranged for bulk waste to be disposed of at the Site?
- A. If not, what is the factual and legal basis for your response.
 - B. If so, what is the factual and legal basis for plaintiffs' contention that Simon arranged for bulk waste to be disposed of at the Site?
 - C. If so, what do plaintiffs contend is the total volume of bulk waste that Simon arranged to be disposed of at the Site?
 - i. What is the factual basis for plaintiffs' contention as to the total volume of bulk waste as set forth in the answer to above?
 - D. If so, what do plaintiffs contend the bulk waste that Simon arranged to be disposed of at the Site consisted of?
 - i. What is the factual basis for plaintiffs' contention as to what the bulk waste consisted of, as set forth in the answer to above?
 - E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

47. Do plaintiffs contend that Thomas & Betts Corporation ("T&B") arranged for the disposal of drummed waste at the Site?

- A. If not, what is the factual and legal basis for your response.
- B. If so, what is the factual and legal basis for plaintiffs' contention that T&B arranged for drummed waste to be disposed of at the Site?
- C. If so, how many drums of waste do plaintiffs contend T&B arranged to be disposed of at the Site?
 - i. What is the factual basis for plaintiffs' contention as to the number of drums set forth in the answer to above?
- D. If so, what do plaintiffs contend the drummed waste that T&B arranged to be disposed of at the Site consisted of?
 - i. What is the factual basis for plaintiffs' contention as to what the drummed waste consisted of, as set forth in the answer to above?
- E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

48. Do plaintiffs contend that T&B arranged for bulk waste to be disposed of at the Site?

- A. If not, what is the factual and legal basis for your response.
- B. If so, what is the factual and legal basis for plaintiffs' contention that T&B arranged for bulk waste to be disposed of at the Site?
- C. If so, what do plaintiffs contend is the total volume of bulk waste that T&B arranged to be disposed of at the Site?
 - i. What is the factual basis for plaintiffs' contention as to the total volume of bulk waste as set forth in the answer to above?
- D. If so, what do plaintiffs contend the bulk waste that T&B arranged to be disposed of at the Site consisted of?
 - i. What is the factual basis for plaintiffs' contention as to what the bulk waste consisted of, as set forth in the answer to above?
- E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

49. Do plaintiffs contend that Unisys Corporation ("Unisys") arranged for the disposal of drummed waste at the Site?

- A. If not, what is the factual and legal basis for your response.
- B. If so, what is the factual and legal basis for plaintiffs' contention that Unisys arranged for drummed waste to be disposed of at the Site?
- C. If so, how many drums of waste do plaintiffs contend Unisys arranged to be disposed of at the Site?
 - i. What is the factual basis for plaintiffs' contention as to the number of drums set forth in the answer to above?
- D. If so, what do plaintiffs contend the drummed waste that Unisys arranged to be disposed of at the Site consisted of?
 - i. What is the factual basis for plaintiffs' contention as to what the drummed waste consisted of, as set forth in the answer to above?
- E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

50. Do plaintiffs contend that Unisys arranged for bulk waste to be disposed of at the Site?

- A. If not, what is the factual and legal basis for your response.
- B. If so, what is the factual and legal basis for plaintiffs' contention that Unisys arranged for bulk waste to be disposed of at the Site?
- C. If so, what do plaintiffs contend is the total volume of bulk waste that Unisys arranged to be disposed of at the Site?
 - i. What is the factual basis for plaintiffs' contention as to the total volume of bulk waste as set forth in the answer to above?
- D. If so, what do plaintiffs contend the bulk waste that Unisys arranged to be disposed of at the Site consisted of?
 - i. What is the factual basis for plaintiffs' contention as to what the bulk waste consisted of, as set forth in the answer to above?
- E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

51. Do plaintiffs contend that United States of America Department of Navy ("Navy") arranged for the disposal of drummed waste at the Site?

- A. If not, what is the factual and legal basis for your response.

- B. If so, what is the factual and legal basis for plaintiffs' contention that Navy arranged for drummed waste to be disposed of at the Site?
- C. If so, how many drums of waste do plaintiffs contend Navy arranged to be disposed of at the Site?
 - i. What is the factual basis for plaintiffs' contention as to the number of drums set forth in the answer to above?
- D. If so, what do plaintiffs contend the drummed waste that Navy arranged to be disposed of at the Site consisted of?
 - i. What is the factual basis for plaintiffs' contention as to what the drummed waste consisted of, as set forth in the answer to above?
- E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

52. Do plaintiffs contend that Navy arranged for bulk waste to be disposed of at the Site?
- A. If not, what is the factual and legal basis for your response.
 - B. If so, what is the factual and legal basis for plaintiffs' contention that Navy arranged for bulk waste to be disposed of at the Site?
 - C. If so, what do plaintiffs contend is the total volume of bulk waste that Navy arranged to be disposed of at the Site?
 - i. What is the factual basis for plaintiffs' contention as to the total volume of bulk waste as set forth in the answer to above?
 - D. If so, what do plaintiffs contend the bulk waste that Navy arranged to be disposed of at the Site consisted of?
 - i. What is the factual basis for plaintiffs' contention as to what the bulk waste consisted of, as set forth in the answer to above?
 - E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

53. Do plaintiffs contend that Haven Chemical Industries/Haven Chemical ("Haven") arranged for the disposal of drummed waste at the Site?
- A. If not, what is the factual and legal basis for your response.
 - B. If so, what is the factual and legal basis for plaintiffs' contention that Haven arranged for drummed waste to be disposed of at the Site?

- C. If so, how many drums of waste do plaintiffs contend Haven arranged to be disposed of at the Site?
 - i. What is the factual basis for plaintiffs' contention as to the number of drums set forth in the answer to C above?
- D. If so, what do plaintiffs contend the drummed waste that Haven arranged to be disposed of at the Site consisted of?
 - i. What is the factual basis for plaintiffs' contention as to what the drummed waste consisted of, as set forth in the answer to above?
- E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

54. Do plaintiffs contend that Haven arranged for bulk waste to be disposed of at the Site?
- A. If not, what is the factual and legal basis for your response.
 - B. If so, what is the factual and legal basis for plaintiffs' contention that Haven arranged for bulk waste to be disposed of at the Site?
 - C. If so, what do plaintiffs contend is the total volume of bulk waste that Haven arranged to be disposed of at the Site?
 - i. What is the factual basis for plaintiffs' contention as to the total volume of bulk waste as set forth in the answer to above?
 - D. If so, what do plaintiffs contend the bulk waste that Haven arranged to be disposed of at the Site consisted of?
 - i. What is the factual basis for plaintiffs' contention as to what the bulk waste consisted of, as set forth in the answer to above?
 - E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

55. Do plaintiffs contend that Envirotec, Inc. ("Envirotec") arranged for the disposal of drummed waste at the Site?
- A. If not, what is the factual and legal basis for your response.
 - B. If so, what is the factual and legal basis for plaintiffs' contention that Envirotec arranged for drummed waste to be disposed of at the Site?
 - C. If so, how many drums of waste do plaintiffs contend Envirotec arranged to be disposed of at the Site?

- i. What is the factual basis for plaintiffs' contention as to the number of drums set forth in the answer to above?
- D. If so, what do plaintiffs contend the drummed waste that Envirotec arranged to be disposed of at the Site consisted of?
 - i. What is the factual basis for plaintiffs' contention as to what the drummed waste consisted of, as set forth in the answer to above?
- E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

56. Do plaintiffs contend that Envirotec arranged for bulk waste to be disposed of at the Site?
- A. If not, what is the factual and legal basis for your response.
 - B. If so, what is the factual and legal basis for plaintiffs' contention that Envirotec arranged for bulk waste to be disposed of at the Site?
 - C. If so, what do plaintiffs contend is the total volume of bulk waste that Envirotec arranged to be disposed of at the Site?
 - i. What is the factual basis for plaintiffs' contention as to the total volume of bulk waste as set forth in the answer to above?
 - D. If so, what do plaintiffs contend the bulk waste that Envirotec arranged to be disposed of at the Site consisted of?
 - i. What is the factual basis for plaintiffs' contention as to what the bulk waste consisted of, as set forth in the answer to above?
 - E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

57. Do plaintiffs contend that Sitkin Smelting & Refining, Inc. ("Sitkin") arranged for the disposal of drummed waste at the Site?
- A. If not, what is the factual and legal basis for your response.
 - B. If so, what is the factual and legal basis for plaintiffs' contention that Sitkin arranged for drummed waste to be disposed of at the Site?
 - C. If so, how many drums of waste do plaintiffs contend Sitkin arranged to be disposed of at the Site?
 - i. What is the factual basis for plaintiffs' contention as to the number of drums set forth in the answer to above?

- D. If so, what do plaintiffs contend the drummed waste that Sitkin arranged to be disposed of at the Site consisted of?
 - i. What is the factual basis for plaintiffs' contention as to what the drummed waste consisted of, as set forth in the answer to above?
- E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

58. Do plaintiffs contend that Sitkin arranged for bulk waste to be disposed of at the Site?

- A. If not, what is the factual and legal basis for your response.
- B. If so, what is the factual and legal basis for plaintiffs' contention that Sitkin arranged for bulk waste to be disposed of at the Site?
- C. If so, what do plaintiffs contend is the total volume of bulk waste that Sitkin arranged to be disposed of at the Site?
 - i. What is the factual basis for plaintiffs' contention as to the total volume of bulk waste as set forth in the answer to above?
- D. If so, what do plaintiffs contend the bulk waste that Sitkin arranged to be disposed of at the Site consisted of?
 - i. What is the factual basis for plaintiffs' contention as to what the bulk waste consisted of, as set forth in the answer to above?
- E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

59. Do plaintiffs contend that Trace International, Inc. ("Trace") arranged for the disposal of drummed waste at the Site?

- A. If not, what is the factual and legal basis for your response.
- B. If so, what is the factual and legal basis for plaintiffs' contention that Trace arranged for drummed waste to be disposed of at the Site?
- C. If so, how many drums of waste do plaintiffs contend Trace arranged to be disposed of at the Site?
 - i. What is the factual basis for plaintiffs' contention as to the number of drums set forth in the answer to above?
- D. If so, what do plaintiffs contend the drummed waste that Trace arranged to be disposed of at the Site consisted of?

i. What is the factual basis for plaintiffs' contention as to what the drummed waste consisted of, as set forth in the answer to above?

E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

60. Do plaintiffs contend that Trace arranged for bulk waste to be disposed of at the Site?

A. If not, what is the factual and legal basis for your response.

B. If so, what is the factual and legal basis for plaintiffs' contention that Trace arranged for bulk waste to be disposed of at the Site?

C. If so, what do plaintiffs contend is the total volume of bulk waste that Trace arranged to be disposed of at the Site?

i. What is the factual basis for plaintiffs' contention as to the total volume of bulk waste as set forth in the answer to above?

D. If so, what do plaintiffs contend the bulk waste that Trace arranged to be disposed of at the Site consisted of?

i. What is the factual basis for plaintiffs' contention as to what the bulk waste consisted of, as set forth in the answer to above?

E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

61. Do plaintiffs contend that General Ceramics Inc., individually and as successor in interest to National Beryllia Corporation and National Beryllia & Ceramics Systems, Inc. ("General Ceramics") arranged for the disposal of drummed waste at the Site?

A. If not, what is the factual and legal basis for your response.

B. If so, what is the factual and legal basis for plaintiffs' contention that General Ceramics arranged for drummed waste to be disposed of at the Site?

C. If so, how many drums of waste do plaintiffs contend General Ceramics arranged to be disposed of at the Site?

i. What is the factual basis for plaintiffs' contention as to the number of drums set forth in the answer to above?

D. If so, what do plaintiffs contend the drummed waste that General Ceramics arranged to be disposed of at the Site consisted of?

i. What is the factual basis for plaintiffs' contention as to what the drummed waste consisted of, as set forth in the answer to above?

E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

62. Do plaintiffs contend that General Ceramics arranged for bulk waste to be disposed of at the Site?

A. If not, what is the factual and legal basis for your response.

B. If so, what is the factual and legal basis for plaintiffs' contention that General Ceramics arranged for bulk waste to be disposed of at the Site?

C. If so, what do plaintiffs contend is the total volume of bulk waste that General Ceramics arranged to be disposed of at the Site?

i. What is the factual basis for plaintiffs' contention as to the total volume of bulk waste as set forth in the answer to above?

D. If so, what do plaintiffs contend the bulk waste that General Ceramics arranged to be disposed of at the Site consisted of?

i. What is the factual basis for plaintiffs' contention as to what the bulk waste consisted of, as set forth in the answer to above?

E. If so, do you contend that such waste contained Hazardous Substances?

ANSWER: See Plaintiffs' response to Interrogatory No. 1.

63. Do plaintiffs contend that Manfred DeRewal, Sr. ("DeRewal") arranged for the disposal of drummed waste at the Site?

A. If not, what is the factual and legal basis for your response.

B. If so, what is the factual and legal basis for plaintiffs' contention that DeRewal arranged for drummed waste to be disposed of at the Site?

C. If so, how many drums of waste do plaintiffs contend DeRewal arranged to be disposed of at the Site?

i. What is the factual basis for plaintiffs' contention as to the number of drums set forth in the answer to above?

D. If so, what do plaintiffs contend the drummed waste that DeRewal arranged to be disposed of at the Site consisted of?